

# EXHIBIT 311

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

Plaintiff,

vs.

No. 22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

V.

JAMES EDWARD STALEY,  
Third-Party Defendant.

14

15 THE ORAL DEPOSITION OF CECILE DE JONGH was  
16 taken on the 29th day of May, 2021 at the Ritz-Carlton  
17 Hotel, 6900 Great Bay, Nazareth, St. Thomas, U.S. Virgin  
18 Islands, between the hours of 9:02 a.m. and 2:22 p.m.  
19 pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

DESIREE D. HILL  
Registered Merit Reporter  
Hill's Reporting Services  
P.O. Box 307501  
St. Thomas, Virgin Islands  
(340) 714-0269

**CECILE DE JONGH -- DIRECT**

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1 A. No.

2 Q. Do you remember a person named [REDACTED]?

3 A. The name I do recognize, yeah.

4 Q. What do you remember about this person,  
5 [REDACTED]?

6 A. The thing I remember correctly is there  
7 was a [REDACTED] who was, when I was out getting my knee  
8 replacement in 2017, I was gone for a while, and I  
9 came back, and I think Jeanne told me that there was  
10 a [REDACTED] who was going to be working with us. And I  
11 said, who? And then -- who -- who worked with us.  
12 And by the time I came back, she was off and on the  
13 payroll.

14 Q. You mean she had gone on the payroll and  
15 then off the payroll?

16 A. Yeah.

17 Q. And you were in New York for, like, two  
18 weeks?

19 A. No. I was gone for about a month.

20 Q. About a month.

21 A. Yeah.

22 Q. And am I correct that you stayed in an  
23 apartment provided by Mr. Epstein in New York?

24 A. Correct.

25 Q. Did you know anything about the other

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1       tenants in the building of the apartment you were  
2       staying in?

3           A.       No. I mean, I confined myself to -- I  
4       mean, I had the surgery. I had two surgeries. One  
5       in July and one in September. So one before  
6       Hurricane Irma and one after. And the reason why I  
7       had the surgery up there was because they couldn't do  
8       the surgery here because of some Medicare issues.

9                   So I asked Mr. Epstein if I could stay  
10      there because I had to stay there for my initial  
11      rehab and my post-op. And he said to deal with  
12      Lesley Groff, and which I did.

13                  And I could have stayed with my  
14      daughter, but she was in a fifth floor walk-up. When  
15      I talked to my doctor, he said that was not going to  
16      work. I needed some place with an elevator. And  
17      also the apartment was, like, six blocks from the  
18      hospital for surgery. So I flew up. First time  
19      stayed with my daughter, did my pre-op. Then went to  
20      the apartment, had my surgery and stayed there.

21                  I had had some heart complications. So  
22      I was there a little bit longer than normal.

23                  MR. NEIMAN: Okay. Ask the reporter to  
24      mark Exhibit 6, another photograph.

25

1 would know. And you followed up with Kenn Hobson?

2 A. Correct.

3 Q. And Kenn Hobson was running the Port  
4 Authority at the time?

5 A. Correct.

6 Q. And the Port Authority would have  
7 interactions with Customs?

8 A. I would assume, yeah, they would.

9 Q. Right. And in fact, Mr. -- when you --  
10 withdrawn.

11 When you spoke to Mr. Hobson, he told  
12 you who was running customs in the Virgin Islands,  
13 this Mr. Harrigan, right?

14 A. Yes.

15 Q. And then you forwarded that information on  
16 to Mr. Epstein. Do you see that?

17 A. Yes.

18 Q. And do you know anything about what the  
19 nature of Mr. Epstein's relationship was with  
20 Mr. Harrigan?

21 A. I do not.

22 Q. Do you know whether Mr. Epstein gave gifts  
23 to the folks at Customs?

24 A. I am not aware. I was not involved. I  
25 know that -- I think he asked me once about my

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1 thoughts of giving turkeys or something, but other  
2 than that.

3 Q. Okay. You remember Mr. Epstein asked you  
4 if you thought it was okay for him to give a turkey to  
5 all the people who work at Customs at the airport --

6 A. I vaguely remember that.

7 Q. -- people who would see who was on his  
8 airplane?

9 A. Yeah. I vaguely remember that, yes.

10 Q. And you said that was okay?

11 A. Yeah. I mean --

12 Q. Did you check with anyone first before you  
13 gave that advice?

14 A. Well, down here, people usually give gifts  
15 to people at Department of Finance, they give, you  
16 know, they give gifts to people who they normally  
17 interact with on a regular basis.

18 You know, it's similar to, you know,  
19 when, you know, my brother-in-law lives in a building  
20 where everybody gives a gift to the doorman, you  
21 know. So that's where I was thinking, I had no  
22 reason to think anything untoward was happening.

23 Q. Sure. But you would recognize that Customs  
24 officials are not like the doorman in your building.  
25 They are law enforcement officers, right?

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1 kind of normal in your experience to --

2 A. Yeah.

3 Q. Let me just finish the question. I'm  
4 sorry.

5 A. I'm sorry.

6 Q. I know I paused there, so that was -- that  
7 was my fault, not yours, but let me just finish the  
8 question.

9 Just in your experience in the way the  
10 government works in the Virgin Islands, would it be  
11 normal, the need to hire a consultant or a lobbyist  
12 to get a dental license approved?

13 MS. BOGGS: Objection to form.

14 THE WITNESS: Here, yes.

15 Q. (By Mr. Neiman:) Okay. And why is that?

16 A. Because it takes a long time to get  
17 licensing through. I went to my doctor a month ago  
18 and said to her, my son has been trying to get in to  
19 see you and you're not taking any more patients. No  
20 one is taking more patients.

21 And she said, you know why? Because I  
22 can't get any of my nurses or P.A.'s through the  
23 board. And she said to me, "Do you have any contact?  
24 Can I get you to go?"

25 And I said, "I don't know." And I

1 literally went online while I was sitting there to  
2 see if I knew anybody on the board, not for pay, but  
3 just to help her out.

4 So I guess that would classify me as a  
5 lobbyist. And I said to her, Well, I know this  
6 person and I know this person, I could call. She  
7 goes, "Anything that you can do, because my last two  
8 P.A.'s came and they left because they waited months  
9 and months and months, and they couldn't practice and  
10 they needed to go back to States. And, therefore, I  
11 can't take any more patients."

12 So, yes, that's how things work here.

13 Q. Okay. I don't mind to be indelicate, but  
14 are people asking for bribes? Is that --

15 A. No, no. It's just -- they just don't --  
16 they have to be together. You know, they have to  
17 meet, and sometimes there is not a full board, so  
18 they don't have a quorum. That's, you know, that's  
19 -- that was the same -- sometimes the same issue with  
20 the EDA where they wouldn't have a full quorum and  
21 they would announce that they're going to, you know,  
22 have all these applications. And then all of sudden  
23 they're canceled because they don't have a quorum.

24 It happens a lot on all these boards.  
25 So, no, it's not that anybody getting paid -- you

1 know, wants to get paid under the table. It's just  
2 can you meet to make decisions.

3 And this is a situation where I didn't  
4 know anybody on the board that I could call up and  
5 say, Hey, what's going on, this person took the  
6 board, they passed the board, what else do they need  
7 to do?

8 Q. Do you remember a time when there was  
9 public reports that Mr. Epstein had supposedly donated  
10 like a million dollars to your husband's campaign? Do  
11 you remember hearing about that?

12 A. Yeah, I remember those reports. Yeah.

13 Q. And so those were -- that's the kind of  
14 news that would find its way to you, right?

15 A. Yes.

16 Q. Was it true?

17 A. No.

18 Q. Okay. Do you remember where that was  
19 covered?

20 A. Where?

21 Q. Yeah.

22 A. I don't.

23 Q. Okay. Let me show you a document and see  
24 if this refreshes your recollection. Exhibit 20.

25

1           Q.     Okay.  And did you have any idea why it was  
2     that [REDACTED] was spending so much time on the island?

3           A.     I just thought maybe she was working  
4     there.

5           Q.     Did she work for FTC?

6           A.     No, but he had another company at Little  
7     St. James.

8           Q.     Okay.  Did you -- well, did she work at  
9     Little St. James?

10          A.     I don't know.  I didn't interact with the  
11     staff at Little St. James.

12          Q.     Did he have employees who didn't speak  
13     English --

14                    MR. TEAGUE:  Objection to form.

15          Q.     (By Mr. Neiman) -- on Little St. James?

16          A.     Yes, he did.

17          Q.     Who?

18          A.     People who were from Dominican Republic;  
19     people who were from Haiti.

20          Q.     Did she have any young women from Eastern  
21     Europe who worked on Little St. James and didn't speak  
22     English?

23          A.     I did not interact with people on Little  
24     -- people who worked on Little St. James.  But I do  
25     know that he had -- he had housekeepers and people

1 who didn't speak English.

2 Q. Okay. Do you remember him asking you to  
3 set up English as a second language courses for three  
4 young women with Eastern European names?

5 A. I remember that he asked me to set up  
6 something, but I don't know that he gave me their  
7 names at UVI. I reached out to a contact. They got  
8 back to me, and then I think that was it. I don't  
9 even know if they ever enrolled.

10 Q. Okay.

11 A. I'm not sure.

12 Q. But you recall -- you recall they actually  
13 did give you the names of three young women, [REDACTED]  
14 [REDACTED]. Remember that?

15 MR. TEAGUE: Objection, form. You can  
16 answer.

17 THE WITNESS: Sitting here now, I don't.

18 Q. (By Mr. Neiman:) Okay. Let's look at 176.

19 A. I did nothing wrong.

20 Q. Let me ask you to take a look at a document  
21 we'll mark as Exhibit 25.

22 (Deposition Exhibit No. 25 was  
23 marked for identification.)

24 Q. (By Mr. Neiman:) Okay. Do you have  
25 Exhibit 25 in front of you?

1                   Q.     Second page of the document in response to  
2 your email.

3                   A.     Eh-hmm.

4                   Q.     Ms. Jackson writes back, right?

5                   A.     Yeah.

6                   Q.     And there's a little back and forth. And  
7 then on the first page, at the bottom of the page  
8 Ms. Jackson advises you that this ESL class isn't  
9 offered every semester. Do you see that?

10                  A.     Yes.

11                  Q.     And that what they do is they keep a list  
12 of names and when they get enough people, they offer  
13 the class. Do you see that?

14                  A.     Yes.

15                  Q.     And you passed that information on to  
16 Mr. Epstein, right?

17                  A.     Yes.

18                  Q.     And Mr. Epstein wrote back to you and said,  
19 "If it worked, both [REDACTED] would sign up."  
20 Do you see that?

21                  A.     Yes.

22                  Q.     So he's now telling you there are two women  
23 who could benefit from an English as a second class --

24                  A.     Okay.

25                  Q.     -- that he might want to arrange, right?